

United States District Court
Northern District of Texas

FILED

Rhonda Fleming

November 16, 2017

v.

KAREN MITCHELL
CLERK, U.S. DISTRICT COURT

United States of America

No. 7:17-cv-0009-"O"

Re: Removal of Counsel
Lift Stay of Proceedings

For the reasons stated in previous motions, Plaintiff Fleming moves for removal of all ADF attorneys as her counsel and that the stay of proceedings be lifted.

The Plaintiff has no interest in negotiations with the Defendants who continue to sexually violate women in federal prisons, fostering indoctrination of inmates into an immoral lifestyle choice of mentally ill men, in clear violation of recognized bodily privacy rights of female inmates. See Oliver v. Scott, (5th Cir.)

A criminal does not get to choose his punishment and nor should the DOJ get to decide if/when men should be removed from a women's prison. This was the substance of the alleged negotiations, while the Defendants continue to allow Linda Thompson, a biological male inmate, 62 years old, to be locked in a cell with very young female inmates, and for his pleasure, view these inmates as they shower - a shower that is in this locked cell.

This is morally and constitutionally wrong. The negotiations are in bad faith because the Defendants continue the described abuses of women while this case is pending, allowing Thompson and other male inmates to degrade women.

Plaintiff Fleming refuses to dismiss any Defendants. More should be added, after discovery, so that the DOJ/BOP

employee who authorized such prison conditions can be held accountable for their actions.

The Plaintiff was personally threatened by BOP employees, stalked & sexually harassed by male inmates, then in August 2017, sexually abused by BOP prison employees as a punishment for this lawsuit. Plaintiff Fleming has a substantiated PREA claim, which means there is video and witnesses of the sexual abuse. This was retaliation, by sexual misconduct, by the Defendants, Mr. Leap. Special Investigative Agent can testify about what his investigation revealed.

Mr. Gittiland, a former Education Dept employee at Carswell, a retired veteran, would testify how he reported a male inmate threatening

Plaintiff Fleming, yet he was ordered not to write an incident report.

The Plaintiff and other female inmates remain in danger. The Plaintiff requires protection from the Defendants and the immediate removal of male inmates from women's prisons. A hearing for injunctive relief is requested as soon as is practicable.

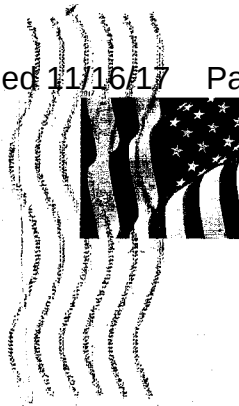
Respectfully Submitted,
[Signature] 11/14/2017
Rhonda Fleming
Mansfield Jail
1601 Heritage Pkwy
Mansfield, TX 76063

Service is performed by electronic filing of this document by the Clerk.

Rhonda Fleming #20446-009
Mansfield Jail
1601 Heritage Pkwy
Mansfield, TX 76063

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INMATE CORRESPONDENCE



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